

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CBV, INC.,

*Plaintiff/Counterclaim-  
Defendant*

C.A. No. 1:21-cv-01456-MN

v.

CHANBOND, LLC,

*Defendant/Crossclaim-  
Defendant*

DEIRDRE LEANE, and IPNAV, LLC

*Defendants/Counterclaim  
Plaintiffs/Crossclaim-  
Plaintiffs.*

**UNOPPOSED PROPOSED INTERVENORS' MOTION FOR  
LEAVE TO FILE UNDER SEAL**

Movants Kamal Mian and Gregory Collins derivatively on behalf of UnifiedOnline, Inc. (proposed intervenors, presently non-parties), by and through its undersigned counsel, respectfully move pursuant to Federal Rule of Civil Procedure 5.2 and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, for leave to file their Response Letter under seal. The bases for this Motion are set forth below:

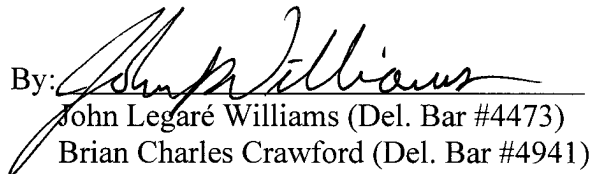
1. The Response Letter may contain information the parties consider confidential information concerning the parties' relationship and their obligations regarding the exchange and treatment of each party's confidential information.
2. It is possible one of the parties would consider the information harmful to one or more parties. In *Littlejohn v. Bic Corp.*, 851 F.2d 673 (3d Cir. 1988), the Third Circuit held that, though the common law afforded the public the right of access to judicial proceedings and

records, that “right is not absolute.” *Id.* At 677-78 (citing *Nixon v. Warner Comm., Inc.* 435 U.S. 589, 598 (1978). Rather, “[c]ourts may deny access to judicial records, for example, where they are sources of business information that might harm a litigant’s competitive standing.” *Id.* at 678 (quoting *Nixon*, 435 U.S. at 598) (emphasis added); see also *Leucadia, Inc. v. Applied Extrusion Tech., Inc.*, 998 F.2d 157, 162 (3d Cir. 1993) (“Documents containing trade secrets or other confidential business information may be protected from disclosure.”).

3. Movants will file a public version of the Response Letter, with the confidential information redacted, within seven days of this motion being granted.

WHEREFORE, Movants Kamal Mian and Gregory Collins respectfully request leave to file their Response Letter in this matter under seal.

Respectfully submitted,

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*Attorneys for proposed intervenors  
KAMAL MIAN and GREGORY COLLINS  
Derivatively on behalf UNIFIEDONLINE, INC.*

Dated: April 27, 2022